

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DEIRDRE MACNAMARA, et al.,
individually and on behalf of those similarly situated,

Plaintiffs, 04-CV-9216 (KMK) (JCF)

-against-

THE CITY OF NEW YORK, a municipal entity, et al.,

ECF Case

Defendants.

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**DECLARATION OF JONATHAN C. MOORE IN SUPPORT OF PLAINTIFFS' REPLY
TO DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT AT THE SITE OF THE FULTON STREET ARRESTS**

JONATHAN C. MOORE, an attorney duly admitted to practice in this Court, pursuant to 28 U.S.C. § 1746, declares as follows:

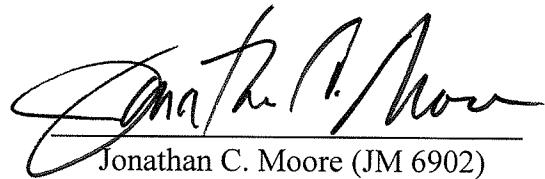
1. I am counsel for plaintiffs and submit this declaration in support of plaintiffs' motion for partial summary judgment on the false arrest claims of class plaintiffs Simon Harak, Diana Raimondi and William Steyert, who were arrested on Fulton Street on August 31, 2004.
2. Attached to this declaration are the Exhibits listed in the Declaration of Jonathan C. Moore in Support of Motion for Partial Judgement at the Site of the Fulton Street Arrests filed on October 3, 2011 (hereinafter Moore 10/3/2011 Declaration) that were not previously filed with the Court.
3. Attached as Exhibit "1" to this declaration are deposition excerpts of the plaintiff Simon Harak.

4. Attached as Exhibit "2" to this declaration are deposition excerpts of the plaintiff Diana Raimondi.

5. Attached as Exhibit "3" to this declaration are deposition excerpts of the plaintiff William Steyert.

6. Attached as Exhibit "4" to this declaration are deposition excerpts of the defendant NYPD Deputy Chief Terence Monahan.

Dated: New York, New York
November 23, 2011



Jonathan C. Moore (JM 6902)